

EXHIBIT 8

From: William F. O'Connor, Jr. <WOconnor@mdmc-law.com>
Sent: Monday, March 24, 2025 4:18 PM
To: Steven I. Adler <sadler@mblawfirm.com>; Todd M. Noshier <tnoshier@mblawfirm.com>
Subject: CC Ford v. Johnson et als.

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Please see the attached.

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March 24, 2025

VIA ELECTRONIC MAIL

Steven I. Adler, Esq.
Mandelbaum Barrett PC
3 Becker Farm Road, Suite 105
Roseland, NJ 07068

Re: CC Ford Group West, LLC v. Johnson, et als.
Civil Action No.: 3:22-cv-04143
MDMC File No. P1166-1001

Dear Mr. Adler:

Our firm has been retained to represent Matthew Ornelas-Kuh in this matter. On March 18, 2025, you filed a Proof of Service with the Court representing that your process server, Jorge Mendez, served the Second Amended Complaint on Mr. Ornelas-Kuh on March 1, 2025. That representation is wrong.

As a threshold matter, your attempt to serve Mr. Ornelas-Kuh is untimely. The Court directed you to promptly serve Mr. Ornelas-Kuh last summer upon the filing of the Second Amended Complaint. You failed to do so. Moreover, Fed.R.Civ.P. 4(m) requires service of process within 90 days after a Complaint is filed. Clearly, your attempt to serve Mr. Ornelas-Kuh nearly 6 months after filing the Second Amended Complaint is improper.

Notwithstanding the representation contained in the Proof of Service, Mr. Mendez did **not** properly serve Mr. Ornelas-Kuh. Mr. Mendez apparently attempted to serve Mr. Ornelas-Kuh at an address in California by trying to leave a copy of the Summons and Second Amended Complaint with an individual named Edward Lowell. The address in question is 78694 Como Court, La Quinta, California 92253. However, Mr. Mendez did not leave anything with Mr. Lowell. He simply left the papers on the front lawn. *More importantly, Mr. Ornelas-Kuh does not reside at that address and has never resided at that address.* Thus, the representation in the Proof of Service is false. You have not served Mr. Ornelas-Kuh with the Second Amended Complaint.

Please be guided accordingly.

Very truly yours,

McELROY, DEUTSCH, MULVANEY & CARPENTER, LLP



William F. O'Connor, Jr.